

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

WEST PUBLISHING CORPORATION, <div style="text-align: center;">Plaintiff / Counterclaim- Defendant,</div> <div style="text-align: center;">v.</div> LEGALEASE SOLUTIONS, LLC, <div style="text-align: center;">Defendant /Counterclaim- Plaintiff.</div>	X : : : : : : X	Civ. No. 18-CV-01445 (DSD/ECW)
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**PLAINTIFF AND
COUNTERCLAIM-DEFENDANT
WEST PUBLISHING CORPORATION’S
MOTION TO COMPEL PRODUCTION OF
DOCUMENTS IN RESPONSE TO SUBPOENA *DUCES TECUM***

Pursuant to Rule 45(d) of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim-Defendant West Publishing Corporation (“West”) hereby moves to compel the production of documents by third-party ROSS Intelligence, Inc. (“ROSS”) in response to a subpoena *duces tecum*. As set forth in the Memorandum of Law filed simultaneously herewith, West has requested relevant documents proportional to the needs of the case. ROSS, for its part, has failed to properly object to the requests such that is has any basis for withholding documents. And further, ROSS has improperly attempted to withhold documents on the basis of privilege.

WHEREFORE, West requests that the Court grant its Motion To Compel Production Of Documents In Response To Subpoena *Duces Tecum* and enter the [Proposed] Order Compelling Production of Documents filed herewith.

Dated: September 24, 2019

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